

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

VERONICA KAY HULINA
* Debtor(s)

Case Number: 5-19-00494
Chapter: 13

CERTIFICATE OF MAILING

The undersigned employee in the office of:

Tullio DeLuca, Esquire

hereby certifies that a copy of the attached Notice of Motion to Sell Free and Clear of All Liens, Charges and Encumbrances was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: October 22, 2021

SIGNED: _____

Lisa Marchal

TITLE: _____

Legal Assistant

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
VERONICA KAY HULINA : CASE NO. 5-19-00494
: CHAPTER 13
Debtor(s) :

VERONICA KAY HULINA :
Movant :
vs. :
M&T BANK, LACKAWANNA :
COUNTY TAX CLAIM BUREAU, :
PORTNOFF LAW ASSOCIATES, :
BOROUGH OF CLARKS SUMMIT, :
INTERNAL REVENUE SERVICE, PA :
DEPARTMENT OF REVENUE, and :
JACK N. ZAHAROPOULOS, ESQUIRE :
Respondents :

NOTICE OF DEBTOR'S MOTION TO APPROVE PRIVATE SALE OF REAL AND
PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CHARGES AND
ENCUMBRANCES

NOTICE IS HEREBY GIVEN THAT:

Debtor, Veronica Hulina, resides at 210 Lansdowne Ave., Clarks Summit, PA 18411 and seeks leave to sell real property of the above captioned case located at 210 Lansdowne Ave., Clarks Summit, PA 18411, along with personal property and fixtures to Patrick Mascia and Janine Dobson, for the sum of Three Hundred Twenty Five Thousand (\$325,000.00) Dollars. The sale is to be free and clear of all liens, charges and encumbrances, with all valid liens and encumbrances to be paid at time of closing.

The Debtors further request the Court to allow distribution of the proceeds from the sale of real and personal property as follows:

1. Any out-of-pocket expenses advanced by Tullio DeLuca, Esquire in connection with the sale of the aforementioned property, and which have not been reimbursed at the time of settlement along with an attorney fee of \$1,488.00;
2. Any Notarization and/or incidental recording fees associated with the sale of the above property;
3. Realtors Commission of 6% percent;

4. Any transfer tax which is the responsibility of the seller herein;
5. Any unpaid real estate taxes and other municipal claims/liens arising from property;
- f. Payment in full to M&T Bank;
- g. That any other unpaid liens shall attach to the remaining sale proceeds;
- h. Debtor's exemption if any;
- i. The net sale proceeds in an amount to pay the balance owed to the Chapter 13 Trustee, if any, from the above sale shall be paid to Jack N. Zaharopoulos, Esq., Chapter 13 Trustee, for distribution to creditors in accordance with the Debtor's confirmed Plan

The Sale is not subject to higher and better offers.

Any inquiries regarding the sale and/or to request for copies of the motion or a time and date to examine the property prior to the sale, can be made directly to Debtor's Counsel, Tullio DeLuca, Esquire.

Hearing on any Answers or Objections will be heard on December 9, 2021 at 9:30. If no objection and request for hearing are timely filed with the Bankruptcy Clerk, 197 South Main Street, Wilkes-Barre, PA 18701 to the sale of the aforementioned real and personal property on the above terms and conditions on or before November 12, 2021, the Court may grant the relief requested. If you desire to contest this matter, file a written objection in the form of responsive pleading and request a hearing with a copy to Tullio DeLuca, Esquire at the address below: Any filing must conform to the Rule of Bankruptcy Procedures unless the Court determines otherwise.

Date of Notice: October 22, 2021

Tullio DeLuca, Esquire
381 N 9th Avenue
Scranton, PA 18504
(570) 347-7764

COMCAST
PO BOX 1931
Burlingame, CA 94011-1931

Comcast-PA
Attn: Bankruptcy
1555 Suzy St.
Lebanon, PA 17046-8318

Granite State Management
4 Barrell Ct.
Concord, NH 03301-8543

Granite State Management
P.O. Box 3420
Concord, NH 03302-3420

Granite State Management and Resources
4 Barrell Court
PO Box 3420
Concord, NH 03302-3420

KML Law Group, P.C
Suite 5000, BNY Mellon Independence
Ctr.
701 Market St.
Philadelphia, PA 19106-1541

M&T BANK
LEGAL DOCUMENT PROCESSING
626 COMMERCE DRIVE
AMHERST NY 14228-2307

Medical Data Systems
2001 9th Ave.
Ste. 312
Vero Beach, FL 32960-6413

Moses Taylor Hospital
700 Quincy Ave
Attn: Justin Davis CEO
Scranton, PA 18510-1798

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Pennsylvania Department of Revenue
Bankruptcy Division
P.O. Box 280946
Harrisburg, PA 17128-0946

SW Credit Systems, LP
4120 International Pkwy., Suite 1100
Carrollton, TX 75007-1958

Synchrony Bank/Toys R Us
Attn: Bankruptcy Dept.
P.O. Box 965060
Orlando, FL 32896-5060

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101-1722

James Warmbrodt.
701 Market Street Suite 5000
Philadelphia, PA 19106-1541

JACK N ZAHAROPOULOS
ATTN CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN PA 17036-8625